

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DEBORAH S. SKEANS, Executrix of the
ESTATE OF FRANK E. PAVLIS,

Plaintiff,

v.

KEY COMMERCIAL FINANCE, LLC,
KEY COMMERCIAL FINANCE
PROPERTIES, LLC, EQUITY PROS, LLC,
and MOBILE AGENCY, LLC

Defendants.

C.A. No. 1:18-cv-01516-CFC

NOTICE OF DEPOSITION

To: Joelle Polesky, Esq.
Stradley Ronon Stevens & Young, LLP
jpolesky@stradley.com

William Mahoney, Esq.
Stradley Ronon Stevens & Young, LLP
wmahoney@stradley.com

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 26 and 30, Defendants/Counterclaim Plaintiffs and Third Party Plaintiff will take the deposition upon oral examination of Deborah S. Skeans, both in her individual capacity and in her capacity as Executrix of the Estate of Frank E. Pavlis (the “Deponent”), on **April 29, 2020**, commencing at **9:30 a.m. (Eastern)**, with such deposition to be conducted via videoconference, or such other dates or at such other time or place as may be agreed upon by the parties or ordered by the Court. Such deposition will continue from day to day until completed. The deposition will be recorded by stenographic means and may be recorded by sound-and-visual means.

The Deponent is respectfully asked to coordinate with her counsel regarding the necessary equipment to conduct the deposition via videoconference and for the instructions to connect with the videoconference.

Dated: April 11, 2020

HALLORAN FARKAS + KITTLA LLP

/s/ Theodore A. Kittila

Theodore A. Kittila (No. 3963)

James G. McMillan, III (No. 3979)

William E. Green, Jr. (No. 4864)

5801 Kennett Pike, Suite C/D

Wilmington, Delaware 19807

Tel: (302) 257-2025

Fax: (302) 257-2019

Email: tk@hfk.law / jm@hfk.law

wg@hfk.law

*Attorneys for Defendants / Counterclaim
Plaintiffs / Third-Party Plaintiff*